

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GARY FRISCH, TAMMY OTTO,
BRIAN KREB, HARRY VASQUEZ,
JADE AND CHRISTOPHER
WADLEIGH, DAVID PERRERA,
DENNIS BERNS, JONATHAN
LISCANO, and ROBERT STUEVE on
behalf of themselves and all those
similarly situated,

Plaintiffs,

v.

FCA US, LLC,

Defendant.

INDEX OF EXHIBITS

- | | |
|------------|--|
| Exhibit 1: | <i>Jeep Wrangler 4xe Recalled Following Eight Fires</i> , THE CAR GUIDE |
| Exhibit 2: | <i>Samsung SDI Might Be The Root of Ford And BMW PHEV Recalls</i> , INSIDEEVS |
| Exhibit 3: | <i>Samsung SDI Voluntarily Recalls EV Batteries in the U.S.</i> , BUSINESSKOREA |
| Exhibit 4: | <i>Lithium-Ion Battery Safety Issues for Electric and Plug-in Hybrid Vehicles</i> , NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION (Oct. 2017) |
| Exhibit 5: | November 22, 2023 Part 573 Safety Recall Report for NHTSA Recall No. 23V-787 |

- Exhibit 6: *Explainer: Are lithium-ion batteries in EVs a fire hazard?*, REUTERS
- Exhibit 7: *Lithium Ion Batteries in EVs Catch Fire*, MEDIUM
- Exhibit 8: *April 2020 Fire Report: How & Why Do Lithium-Ion Batteries Fail, Insight from the Jedi Master of Lithium Power!*, WASTE360
- Exhibit 9: Mild Hybrid Motor Generator Unit Battery Pack, MYMOPARPARTS
- Exhibit 10: *Stellantis and Samsung SDI to Invest Over \$2.5 Billion in Joint Venture for Lithium-Ion Battery Production Plant in United States*, STELLANTIS PRESS RELEASE
- Exhibit 11: *Burbank et al. v. BMW of N. Am.*, No. 2:21-cv-01711 (D.N.J.) (Dkt. No. 1, at ¶ 15) (Dec. 3, 2020)
- Exhibit 12: *Batteries for Hybrid and Plug-In Electric Vehicles*, U.S. DEP'T OF ENERGY
- Exhibit 13: *A Review on Lithium-Ion Batteries Safety Issues: Existing Problems and Possible Solutions*, AMERICAN SCIENTIFIC PUBLISHERS
- Exhibit 14: *Thermal runaway mechanism of lithium ion battery for electric vehicles: A review*, SCIENCEDIRECT
- Exhibit 15: *Lithium-ion batteries*, EXPLAINTHATSTUFF!
- Exhibit 16: *What is Thermal Runaway?*, UNDERWRITERS LABORATORIES
- Exhibit 17: *Preventing Thermal Runaway in Electric Vehicle Batteries*, MACHINE DESIGN
- Exhibit 18: CLRA Venue Declaration of Plaintiff Kreb